

EXHIBIT A

1 usage of this term in Federal Rule of Civil Procedure 34(a) and means anything responsive
2 within the meaning of Federal Rule of Civil Procedure 34, including, but not limited to,
3 communications (as defined below).

4 H. The word “communication” means any actual or attempted transmittal of
5 information (e.g., of facts, ideas, inquiries, or otherwise) regardless of form, including but not
6 limited to any content that you created, shared with, posted to, or any way provided or published
7 on any online services, as well as any other electronically stored information, and any oral,
8 written, email, letter, notes, telephone conversation, computer drop-down selection, etc.

9 I. “Concerning” means referencing, relating to, describing, evidencing, reflecting,
10 constituting, documenting, discussing, referring to, mentioning, analyzing, refuting, or recording.

11 J. “Facebook” means Facebook, Inc., and all persons or entities acting or having
12 acted on its behalf, including but not limited to its divisions, subsidiaries, holding companies,
13 predecessors, Facebook, Messenger, Instagram, WhatsApp, and any other related entity.

14 K. “Online services” means any public-facing internet website, web application,
15 digital application or other service provided online in any form or by any method, including but
16 not limited to email or messaging services, and any news, ecommerce, entertainment, streaming
17 video, streaming audio, television, or gaming services, applications, or websites.

18 L. “Personal information” has the meaning provided by California Civil Code
19 § 1798.140(o)(1).

20 M. The use of the singular herein shall be deemed to encompass the use of the plural
21 and vice versa.

22 N. The connectives “and” and “or” shall be construed either disjunctively or
23 conjunctively as necessary to bring within the scope of the requests all information that might
24 otherwise be construed as outside of their scope.

25 O. The term “any” includes “all” and “each,” and the term “all” includes “any,” and
26 the term “each” includes “every.”

27 P. To the extent these requests employ terms used in the complaints in this action,
28 such use is without prejudice to the rights of Facebook.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1.

All documents concerning your accounts or profiles, including usernames, on any online services during the Relevant Time Period.

RESPONSE:

REQUEST NO. 2.

Documents sufficient to identify any online services that you maintain or ever maintained during the Relevant Time Period.

RESPONSE:

REQUEST NO. 3.

All documents concerning your reasons for creating any accounts or profiles on any online services during the Relevant Time Period.

RESPONSE:

REQUEST NO. 4.

All documents concerning any communications that you had on any online services during the Relevant Time Period.

RESPONSE:

REQUEST NO. 5.

Documents sufficient to identify your account or accounts on any online services during the Relevant Time Period, including without limitation, your user or login name(s) or other identifying information.

RESPONSE:

1 **REQUEST NO. 6.**

2 All documents concerning the time or attention that you gave to or spent on any online
3 services during the Relevant Time Period, including but not limited to web browser history,
4 internet access data, or screen time reports.

5 **RESPONSE:**

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7 **REQUEST NO. 7.**

8 All documents concerning the data or personal information that you gave to or shared
9 with or on any online services during the Relevant Time Period.

10 **RESPONSE:**

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12 **REQUEST NO. 8.**

13 All documents concerning any monetary or other pecuniary benefit that you have
14 received in exchange for your personal information or time or attention from any source during
15 the Relevant Time Period.

16 **RESPONSE:**

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18 **REQUEST NO. 9.**

19 All documents concerning your reasons for using Facebook, as defined above.

20 **RESPONSE:**

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22 **REQUEST NO. 10.**

23 All documents concerning your reasons for using any online services during the Relevant
24 Time Period.

25 **RESPONSE:**

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REQUEST NO. 11.

All documents (including but not limited to any communications) concerning Facebook (as defined above).

RESPONSE:

REQUEST NO. 12.

All documents (including but not limited to any communications) concerning any online services during the Relevant Time Period.

RESPONSE:

REQUEST NO. 13.

All documents concerning Facebook’s privacy protections, privacy policies, or privacy practices, including but not limited to documents sufficient to show all privacy settings on your accounts with Facebook (as defined above).

RESPONSE:

REQUEST NO. 14.

All documents concerning the privacy protections, privacy policies, or privacy practices of any online services that you used during the Relevant Time Period, including but not limited to documents sufficient to show all privacy settings on all your accounts.

RESPONSE:

REQUEST NO. 15.

All documents concerning the allegation that you “care[] about [your] online privacy,” including but not limited to the privacy protections, privacy policies, or privacy practices of any device in your possession or control that is connected to the internet or otherwise capable of remote or wireless connection, including but not limited to any “smart” devices such as speakers